

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MINNESOTA**

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In re: Baycol Products Litigation

UNITED STATES OF AMERICA *ex rel.*  
LAURIE SIMPSON,

Honorable Michael J. Davis  
United States District Court Judge

*Plaintiff,*

v.

BAYER HEALTHCARE  
PHARMACEUTICALS, INC.;  
BAYER CORP.; and  
BAYER A.G.,

MDL No. 1431  
Civil. No. 08-5758(MJD)(SER)

*Defendants.*

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**JOINT STATUS REPORT**

In accordance with the Court's January 18, 2019 Order (ECF No. 178), Relator Laurie Simpson ("Relator") and Defendants Bayer Healthcare Pharmaceuticals, Inc., Bayer Corp., and Bayer A.G. ("Bayer") (together, the "Parties"), respectfully submit the following joint status report.

Since the last status conference on February 26, 2019, Relator has served her Second Request for Production and Bayer has served its Responses and Objections to Relator's First Request for Production. The Parties have also exchanged draft orders to address: the production of any protected health information in compliance with HIPAA regulations; the production of privileged information under Rule 502(d); and the production of electronically-stored

information (“ESI”). The Parties are continuing to meet and confer about the production of discovery in response to Relator’s First and Second Requests for Production, as well as the entry of the protective orders described above. The Parties do not believe that there are any discovery issues that require the Court’s intervention at this time.

The Parties are available if the Court wishes to discuss the status of discovery at the conference scheduled for March 26, 2019. However, in light of the foregoing, the Parties believe that the status conference may be postponed until April 26, 2019.

Dated: March 19, 2019

Respectfully submitted,

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/s/ Asher Alavi

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*Counsel for Defendants Bayer  
Corporation, Bayer AG and  
Bayer Healthcare Pharmaceuticals, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on March 19, 2019, the foregoing document was served this day  
on all counsel of record via CM/ECF.

/s/ Asher S. Alavi